

**UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA  
No. 24-CV-380**

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C.M., *a minor, through his parents,*  
LEAH MCGHEE AND CHAD  
MCGHEE,

Plaintiff,

v.

DAVIDSON COUNTY BOARD OF  
EDUCATION; *and* ERIC R.  
ANDERSON, *in his individual*  
*capacity,*

Defendants.

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**PLAINTIFF’S MOTION TO SEAL**

Plaintiff C.M., a minor, through his parents Leah McGhee and Chad McGhee, respectfully moves the Court for an order, pursuant to Federal Rules of Civil Procedure 5.2(d) and Local Civil Rule 5.4 to allow Defendant to file Exhibit A (the “Revised Settlement”) to Plaintiff’s Supplemental Motion for Settlement Approval under seal.

Judge Biggs previously granted Defendants’ motion to seal documents recognizing that this case implicates issues of student privacy rights under the Family Educational Rights and Privacy Act, *see* 20 U.S.C. § 1232(g); *see* also 34 C.F.R. Part 99 (“FERPA”), *see* ECF No. 35; July 17, 2024 text order (adopting the Parties report under Local Rule 5.5) (Auld, M.J.). Defendants

have also clarified their position that confidentiality provisions within the Revised Settlement further support sealing, and Plaintiff does not object to that request here.

**REQUEST FOR RELIEF**

WHEREFORE, for the reasons set forth herein Plaintiff respectfully requests that the Revised Settlement be filed under seal.

Dated: June 30, 2025

Respectfully submitted,  
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